

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, JANE DOE-1,  
JANE DOE-2, EDWIN  
MALDONADO, PATRICK  
COLLIGAN, PETER  
ANDREYEV, and WILLIAM  
SULLIVAN,

Plaintiffs,

v.

SEARCH QUARRY, LLC, SEARCH  
QUARRY, INC., RICHARD ROES 1-  
10, fictitious names of unknown  
individuals and ABC COMPANIES 1-  
10, fictitious names of unknown  
entities,

Defendants.

CIVIL ACTION

**CASE #: 3:24-cv-04106-MAS-TJB**

**NOTICE OF MOTION FOR *PRO  
HAC VICE* OF COUNSEL AND  
STATEMENT THAT NO BRIEF  
IS NECESSARY**

**PLEASE TAKE NOTICE** that Defendants Search Quarry Inc. and Search Quarry LLC, by and through its counsel, Clark Hill, PLC, shall move before the Honorable Tonianne J. Bongiovanni, U.S.M.J. at the United States District Court for the District of New Jersey, Trenton Vicinage, 402 East State Street, Trenton, NJ 08608, for an Order granting the *pro hac vice* admission of Chirag H. Patel, Esq. and Myriah Jaworski, Esq., in accordance with Local Civil Rule 101.1(c), on a date to be determined by the Court.

**PLEASE TAKE FURTHER NOTICE** that the Defendants will rely upon the Declaration of Steven M. Richman, Esq., the Declaration of Chirag H. Patel, Esq., and the Declaration of Myriah Jaworski, Esq., which accompany this Motion.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**NO BRIEF OR ORAL ARGUMENT IS NECESSARY** in light of the nature of this Motion and the contents of the accompanying declarations. *See* L. Civ. R. 7.1(d)(4).

**CLARK HILL PLC**

By: /s/ Steven M. Richman  
Steven M. Richman

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*Attorneys for Defendants Search Quarry Inc. and  
Search Quarry LLC*

Dated: April 2, 2024

**CERTIFICATION OF SERVICE**

I hereby certify that on April 2, 2024, I caused to be served the foregoing Motion for Admission *Pro Hac Vice* upon all counsel of record via the Court's electronic filing system.

/s/ Steven M. Richman  
STEVEN M. RICHMAN